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Attorneys for Plaintiff JENELL  
RIVERA, individually and on behalf of  
others similarly situated

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Attorneys for Defendant  
WAL-MART ASSOCIATES, INC.  
and SAM'S WEST, INC.

[Additional Counsel on Following Page]

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JENELL RIVERA, individually and on  
behalf of all others similarly situated,

Plaintiff,

vs.

WAL-MART ASSOCIATES, INC., a  
Delaware corporation; SAM'S WEST,  
INC. and Arkansas corporation and  
DOES 1 through 50, inclusive,

Defendants.

Case No. 2:23-cv-08723-ODW-MRW  
Hon. Otis D. Wright II

**CLASS ACTION**

**STIPULATED JUDGMENT AND  
ORDER**

1 Mitchell A. Wrosch (SBA 262230)  
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4 **SMOAK & STEWART, P.C.**  
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11 Attorneys for Defendant  
12 WAL-MART ASSOCIATES, INC.  
13 and SAM'S WEST, INC.  
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1 COME NOW Plaintiff Jenell Rivera (“Plaintiff”) and Defendants Wal-  
2 Mart Associates, Inc. and Sam’s West, Inc. (“Defendants”) (collectively, the  
3 “Parties”), by and through their attorneys of record, and hereby agree and stipulate  
4 as follows:

5 Plaintiff having timely accepted the Statutory Offer to Compromise  
6 Pursuant to California Code of Civil Procedure Section 998 (Dkt. 41), served  
7 by Defendants, JUDGMENT IS ENTERED as follows:

- 8 1. For Plaintiff and against Defendants in the amount of Ten Thousand  
9 Eight Hundred and Thirty Dollars and Zero Cents (\$10,830.00),  
10 exclusive of all attorneys’ fees and costs;
- 11 2. Plaintiff’s individual claims in this action are dismissed with  
12 prejudice; and
- 13 3. The putative class claims in this action are dismissed without  
14 prejudice.

15 IT IS FURTHER ORDERED as follows:

- 16 4. Defendants shall pay \$10,830.00 to Plaintiff within 21 days of entry  
17 of judgment;
- 18 5. Plaintiff’s counsel shall have 90 days from the date of entry of this  
19 Judgment and Order in which to file any motion for an award of  
20 reasonable attorney’s fees and costs in pursuit of Plaintiff’s claims in  
21 this action and recoverable by law. If such motion is filed,  
22 Defendants’ opposition will be due 30 days thereafter, and Plaintiff’s  
23 reply shall be due 14 days after Defendants’ opposition; and
- 24 6. The Court shall retain ancillary jurisdiction to decide any motion for  
25 an award of reasonable attorney’s fees and costs.

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27 **IT IS SO STIPULATED.**  
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1 Dated: June 30, 2025

**MATERN LAW GROUP, PC**

2  
3 By: /s/ Mikael H. Stahle

4 MATTHEW J. MATERN  
MIKAEL H. STAHLE

5 Attorneys for Plaintiff JENELL  
6 RIVERA, individually and on behalf  
7 of all others similarly situated

8 Dated: June 30, 2025

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

9  
10 By: /s/ Mitchell A. Wrosch

11 MITCHELL A. WROSCH  
12 PALOMA P. PERACCHIO

13 Attorneys for Defendant WAL-  
14 MART ASSOCIATES, INC. and  
15 SAM'S WEST. INC.

**SIGNATURE ATTESTATION**

16 I hereby attest that all other signatories listed, on whose behalf the filing  
17 is submitted, concur in the filing's content and have authorized the filing.

18 Dated: June 30, 2025

19 By: /s/ Mikael H. Stahle

20 MIKAEL H. STAHLE  
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